

# EXHIBIT “A”

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2017-26790 / Court: 011

DOCKET NO. \_\_\_\_\_

ILANA ARMALY PAPANDREAOU	§	IN THE DISTRICT COURT OF
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
CRAIG OLSON and D & E ELITE	§	
TRANSPORT, INC.	§	_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION  
AND REQUESTS FOR DISCLOSURE

ILANA ARMALY PAPANDREAOU, complains of CRAIG OLSON and D & E ELITE  
TRANSPORT, INC. and will show the following:

**1. Discovery Plan**

Plaintiff intends to conduct discovery pursuant to level 2 as per Texas Rule of Civil Procedure  
190.

**2. Parties**

ILANA ARMALY PAPANDREAOU, Plaintiff, is an individual who resides in Houston,  
Texas.

CRAIG OLSON, Defendant, is an individual who resides in Menomonie, Wisconsin and  
may be served with citation at his residence, N 5577 330<sup>th</sup> Street, Menomonie, Wisconsin 54751.

D & E ELITE TRANSPORT, INC. is foreign corporation, organized and existing under the  
laws of the State of Wisconsin and having its principal place of business in Fort Atkinson,  
Wisconsin. This defendant may be served with citation by serving its registered agent for service of  
citation, Erik Potter N796 Twin Knolls Drive, Fort Atkinson, Wisconsin 53538-9801.

**3. Venue and Jurisdiction**

This court has jurisdiction because the amount in controversy is within the jurisdictional  
limits of this court. This court has jurisdiction against all parties because the parties *willingly*

conducted business in the State of Texas and in Harris County.

Venue is proper in Harris County, Texas because the incident made the basis of this suit occurred in Harris County, Texas.

#### **4. Facts**

The incident made the basis of this suit occurred on or about April 24, 2015. Craig Olson was operating a tractor trailer rig on Hempstead Highway in Houston, Harris County, Texas. Hempstead Highway is a four lane road with two lanes in each direction. Olson was traveling in the left-hand lane, westbound on Hempstead Highway and attempting to make a right turn onto a private drive. Ms. Ilana Armaly Papandreaou was also traveling westbound on Hempstead Highway in the right lane. Olson began executing his turn in a manner in which he crossed over the right lane, but failed to yield to traffic also traveling west bound. When he entered the right-hand lane, Ms. Papandreaou was unable to bring her vehicle to a stop and collided with the side of his tractor trailer.

#### **5. Negligence**

This incident and all the resulting damages to Ilana Armaly Papandreaou was proximately caused by the negligent conduct, both of omission and commission, of Craig Olson.

#### **6. Respondeat Superior**

At all times relevant to this incident, Craig Olson was working on behalf of D & E Elite Transport, Inc. and D & E Elite Transport, Inc. is responsible under the theory of respondeat superior

#### **7. Damages**

Ilana Armaly Papandreaou seeks recovery of the damage to her vehicle. Additionally, Ilana Armaly Papandreaou was injured in the collision as a proximate result of the conduct of the defendant. She sustained injuries that required medical treatment and seeks to recover damages for (1) all of his medical expenses, (2) physical pain and mental anguish, (3) physical disfigurement, and (4) physical impairment, all in the past and into the future

### **8. Request for Disclosure**

As permitted by Texas Rule of Civil Procedure 194, Plaintiff requests that Defendants disclose the information or material described in Rule 194.2(a) through 194.2(k) within fifty (50) days of the receipt of service of this request.

### **PRAYER**

Ilana Armaly Papandreaou prays that defendants be served with citation and that on final trial plaintiff be awarded actual damages, pre-judgment and post judgment interest, costs of court and all other damages against defendants, jointly and severally, to which plaintiff may be entitled.

Respectfully submitted,

**HARBERG HUVARD JACOBS WADLER, LLP**

By: 

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**ATTORNEY FOR PLAINTIFF**



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this June 12, 2017

Certified Document Number: 74775284 Total Pages: 3

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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